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12	Attorneys for Defendants			
13	GOOGLE LLC and YOUTUBE, LLC			
14	UNITED STATES DISTRICT COURT			
15	NORTHERN DISTRICT OF CALIFORNIA			
16	SAN JOSE DIVISION			
17				
18	PRAGER UNIVERSITY,	CASE NO.: 5:17-cv-06064-LHK		
19	Plaintiff, ) v.	STIPULATED REQUEST TO CHANGE TIME REGARDING		
20	GOOGLE LLC, a Delaware corporation,	RESPONSE TO COMPLAINT AND		
21	YOUTUBE, LLC, a Delaware limited ) liability company, and DOES 1-25,	MOTION FOR PRELIMINARY INJUNCTION, SUBSEQUENT		
22	Defendant.	BRIEFING, AND CASE MANAGEMENT CONFERENCE		
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STIP. REQUEST TO CHANGE TIME RE. RESPONSE TO COMPL. AND MOT. FOR PRELIM. INJ., SUBSEQUENT BRIEFING, AND CMC

1	Plaintiff Prager University and Defendants Google LLC and YouTube, LLC.				
2	(collectively, "the parties"), by and through their respective counsel of record, hereby stipulate as				
3	follows:				
4	WHEREAS, Plaintiff filed this action on October 23, 2017;				
5	WHEREAS, Defendants were served on October 30, 2017 and have until November 20,				
6	2017 to answer or otherwise respond to Plaintiff's Complaint (see Dkts. 12 and 13);				
7	WHEREAS, Defendants expect to respond to the Complaint by moving to dismiss;				
8	WHEREAS, Plaintiff expects to move for a preliminary injunction on some of its claims;				
9	WHEREAS, Defendants have requested and Plaintiff has consented to extending the				
10	deadline for Defendants to answer or otherwise respond to the Complaint to December 29, 2017;				
11	WHEREAS, subject to Court approval, the parties have also agreed to a briefing schedule				
12	for subsequent briefs related to Defendants' motion to dismiss and Plaintiff's motion for a				
13	preliminary injunction;				
14	WHEREAS, extending the deadline for Defendants to answer or otherwise respond to the				
15	Complaint to December 29, 2017 and setting the other deadlines as set forth below will not alter				
16	the date of any event or any deadline already fixed by Court order;				
17	WHEREAS, the parties currently have an Initial Case Management Conference in this				
18	action scheduled for January 24, 2018 (Dkt. 7);				
19	NOW, THEREFORE, based on the above stipulation, pursuant to Civil Local Rules 6-2				
20	and 7-12, and with Defendants and Plaintiff reserving all rights and defenses, the parties				
21	respectfully ask the Court to enter the attached proposed order, which provides that:				
22	1. Defendants shall have until December 29, 2017 to answer or otherwise respond to				
23	Plaintiff's Complaint;				
24	2. Plaintiff shall have until December 29, 2017 to file its Motion for a Preliminary				
25	Injunction;				
26	3. Plaintiff shall have until February 9, 2017 to file papers in opposition to any motion				
27	to dismiss and Defendants shall have until February 9, 2017 to file papers in opposition to				
28	Plaintiff's Motion for a Preliminary Injunction;				
	STIP. REQUEST TO CHANGE TIME RE. RESPONSE TO -2- CASE NO. 5:17-cv-06064-LHK				

COMPL. AND MOT. FOR PRELIM. INJ., SUBSEQUENT

BRIEFING, AND CMC

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1	4.	Defendants shall have until Febru	nary 23, 2017 to file reply papers in further suppor		
2	of any motion to dismiss and Plaintiff shall have until February 23, 2017 to file reply papers in				
3	further support of its Motion for a Preliminary Injunction;				
4	5.	Defendants and Plaintiff shall see	k to notice the hearings on their respective		
5	motions to dismiss and for a preliminary injunction at the same time, on the first available date				
6	after briefing has concluded;				
7	6.	The dates set for the initial Case I	Management Conference (currently scheduled for		
8	January 24, 2018), and the Joint Case Management Statement (currently due January 17, 2018),				
9	are vacated; and				
10	7.	The Court will reschedule the init	tial Case Management Conference following		
11	rulings on Defendant's anticipated motion to dismiss and/or Plaintiff's Motion for a Preliminary				
12	Injunction.				
13					
14	Dated: Nover	mber 8, 2017	Respectfully submitted,		
15 16			WILSON SONSINI GOODRICH & ROSATI Professional Corporation		
17			By: /s/ David H. Kramer DAVID H. KRAMER		
18 19			Attorneys for Defendant GOOGLE LLC and YOUTUBE, LLC.		
20					
21	Dated: Nover	mber 8, 2017	Respectfully submitted,		
22			BROWNE GEORGE ROSS LLP		
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24			By: <u>/s/ Peter Obstler</u> PETER OBSTLER		
25			Attorneys for Plaintiff		
26			PRAGÉR UNIVERSITY		
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STIP. REQUEST TO CHANGE TIME RE. RESPONSE TO COMPL. AND MOT. FOR PRELIM. INJ., SUBSEQUENT BRIEFING, AND CMC

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1	Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document hereby attests that
2	concurrence in the filing of the document has been obtained from each of the other Signatories.
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4	<u>/s/ David H. Kramer</u> DAVID H. KRAMER
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STIP. REQUEST TO CHANGE TIME RE. RESPONSE TO COMPL. AND MOT. FOR PRELIM. INJ., SUBSEQUENT BRIEFING, AND CMC